

LAW OFFICES OF DALE K. GALIPO
Dale K. Galipo, Esq. (SBN 144074)
dalekgalipo@yahoo.com
Cooper Alison-Mayne (SBN 343169)
cmayne@galipolaw.com
21800 Burbank Boulevard, Suite 310
Woodland Hills, CA 91367
Phone: (818) 347-3333

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

URSULA BYRAM, S.B. by and
through guardian ad litem TIMOTHY
BYRAM, N.B. by and through guardian
ad litem TIMOTHY BYRAM, and A.B.
by and through guardian ad litem
KAITLYN HUMENCHUK,
individually and as successors-in-
interest to Everett Byram,

Plaintiffs,

v.

COUNTY OF LOS ANGELES,
BLAKE RUNGE, and BRENDA
ALCANTARA,

Defendants.

Case No. 2:23-cv-09285-KS

[Assigned to Hon. Karen L. Stevenson,
Courtroom 580]

**DECLARATION OF PLAINTIFFS’
COUNSEL COOPER ALISON-
MAYNE IN OPPOSITION TO JMIL
NO. 2.**

Final Pretrial Conference/Hearing on
Motions in *Limine*

Date: January 21, 2025

Time: 10:00 a.m.

Courtroom: 580

Trial Date: February 10, 2025

DECLARATION OF COOPER ALISON-MAYNE

I, Cooper Alison-Mayne, hereby declare as follows:

1. I am an attorney licensed to practice law in this United States District Court. I am one of the attorneys of record for Plaintiffs in this action. I have personal knowledge of the matters stated herein and would and could testify competently thereto if called. I make this declaration in support of Plaintiffs' Motions in Limine filed concurrently herewith.

2. Attached hereto as "Exhibit 1" is a true and correct copy of the article referenced in my portion of Plaintiffs' opposition to Joint Motion in Limine 2 (ECF No. 89).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this December 10 in Woodland Hills, California.

BY: /s/ Cooper Alison-Mayne

COOPER ALISON-MAYNE
Attorney for Plaintiffs.

EXHIBIT 1

The Wayback Machine - <https://web.archive.org/web/20231129161228/https://knock-la.com/lasd-deputy-sho...>



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TRENDING PUBLIC HOUSING COMPTON POLICE BRUTALITY SANTA ANA



NEWS

LASD POLICE BRUTALITY

LASD Deputy with Violent History Behind Latest Department Killing

A man who previously mocked people of color killed by police was killed by an alleged member of a white supremacist deputy gang.

Cerise Castle | May 7, 2023



(Source: LASD)

A white man who previously mocked people of color killed by police was shot and killed by an alleged member of a Ku Klux Klan-themed deputy gang.

The February 10 shooting death of Everett Byram — a father of three, known as @rad_milk online — drew taunts from social media users. Byram, who was in the midst of a mental health crisis, was killed at his home by a Los Angeles County Sheriff's (LASD) deputy. Blake Runge, the deputy who fired the fatal shot, has been identified as a member of the IPA deputy gang by former colleagues. He has also been implicated in one use of force resulting in a broken skull and one additional shooting.

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FO2526126 – Case – Public [Download](#)

“The pervasiveness of gangs within law enforcement agencies is becoming more and more common and is very concerning,” Dale K. Galipo, attorney for the Byram family, told *Knock LA*.

A Violent Career Trajectory

According to department records, Runge joined LASD on April 21, 2016. He graduated from the department’s Biscailuz Center Training Academy in Los Angeles during ceremonies held on September 23, 2016, per a department [Facebook post](#).



Blake Runge (center behind flag) graduates from Academy Class 415 as the honor recruit, which LASD awards to a recruit who “achieves the highest numerical average based upon leadership qualities, academics, marksmanship, and physical performance throughout the training period.” (Facebook)

In 2018, Runge was working at the North County Correctional Facility in Castaic. The facility is also home to the IPA deputy gang, a group of deputies who engage in misconduct and violence against incarcerated people. In response to a question about whether LASD was investigating the IPA gang, a spokesperson stated, “The Department does not tolerate deputy gangs or conduct contrary to our values.”

By early 2021, Runge was approved to move on to patrol at the department’s Palmdale station. On February 16, he was involved in a category 3 use-of-force incident against a man with a mental health condition, according to a department report.

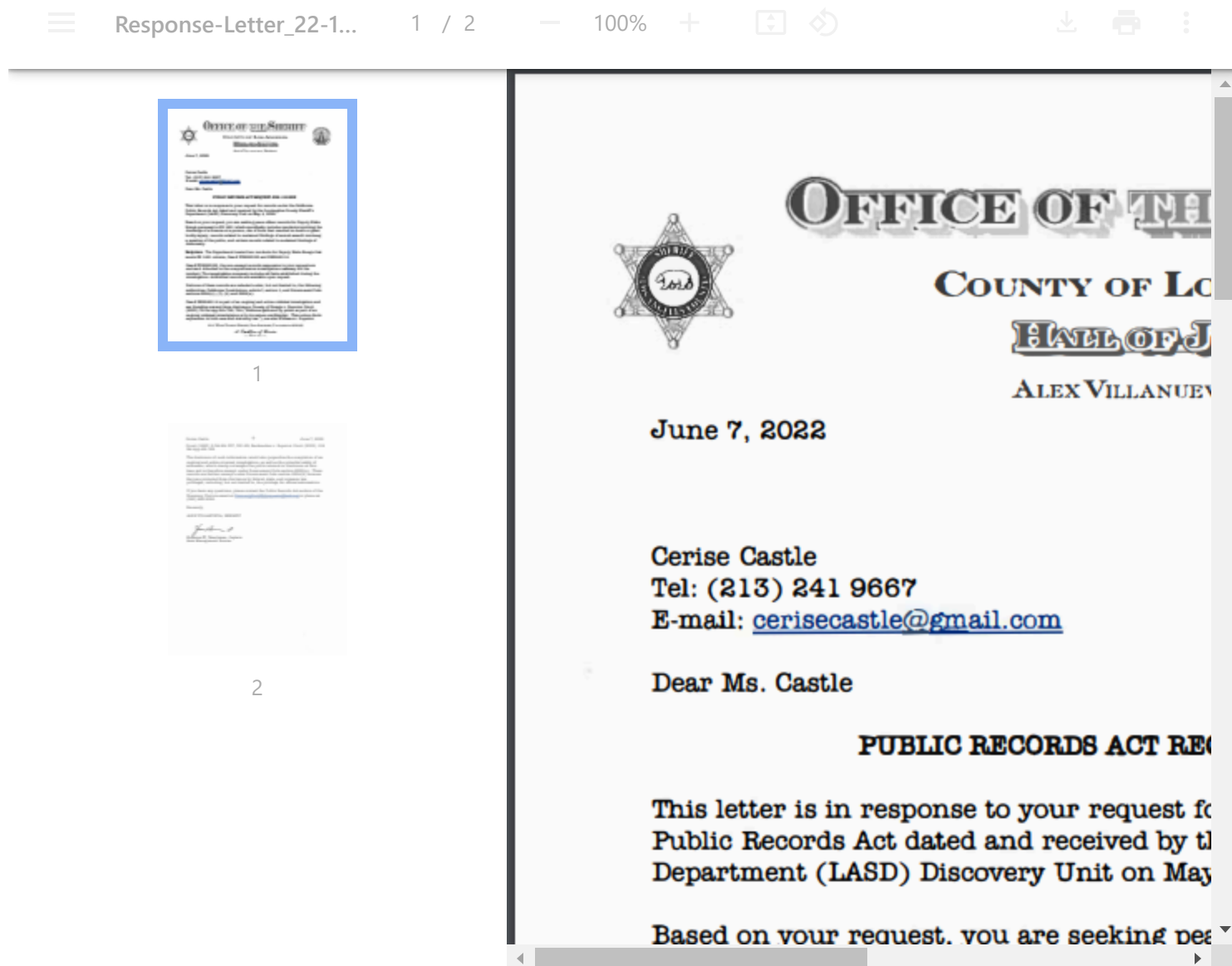
That day, Moses Hanson, who had not taken his medication, was sitting near a fallen tree and shovel on East Avenue Q2 in Palmdale. For unknown reasons, this prompted Runge and his partner, Jacob Consola, to pull over their patrol vehicle. As the deputies exited, Hanson ran. Consola ran after Hanson and tased him within seconds of making contact, according to an internal investigation.

The deputies claim this had no effect on Hanson, who punched Runge in the shoulder upon being tasered. In response, Runge, who is half a foot taller than Hanson, punched Hanson approximately nine times in the face, fracturing his cheek bone. Runge and Consola then kneeled on Hanson’s arms as he lay on his stomach until other units arrived, at which point Hanson was handcuffed. He eventually pled no contest to one charge of vandalism and guilty to one count of resisting an executive officer.

The department’s Executive Force Committee reviewed the incident and found that Runge and Consola’s tactics were within policy.

At some point before June 2022, Runge was involved in a shooting, according to department records. However, the records containing details related to the shooting have not been made available to the public yet, pending a

criminal investigation.



Response Letter_22-11912SE Download

A Deadly Response to a Mental Health Crisis

In February 2023, Runge shot and killed 34-year-old Everett Byram. Two deputies were called to Byram's home, where he lived with his wife and two young children, after he assaulted her and threatened to kill himself, according to [body camera video](#). His wife told the deputies that he had done this before and was no longer in the home. The two deputies searched the home and entered the backyard with Runge and his partner following.

At some point during their search, the two lead deputies came to a fence along the home's side yard. Video shows Byram emerging from behind a smaller fence protruding from the side of the home and swinging a large sword. He yells racial and homophobic slurs at the deputies and tells them to shoot him. Runge's bodycam footage shows him walking to the fence as another deputy asks who has a taser, and Runge appears to respond, "I do."

Byram then takes two small steps toward the deputies, swinging the sword above his head. The deputy with the less lethal weapon yells “40, 40!” — indicating that he is about to fire. As he shoots, Runge fires his gun, killing Byram.

Byram’s family is pursuing a claim against Los Angeles County for his death. LASD did not respond to requests about Runge’s status within the department or the status of the internal review of the killing of Everett Byram.

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